

Margaret M. Fox

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T (803) 799-9800

December 30, 2014

Ms. Jocelyn Boyd
Chief Clerk and Administrator
South Carolina Public Service Commission
Synergy Business Park, The Saluda Building
101 Executive Center Drive
Columbia, South Carolina 29210

Re: Rate Floor Certifications Filed Pursuant to Federal Communications
Commission Regulation 47 C.F.R. § 54.313(h)
Docket No. 2013-268-C

Dear Ms. Boyd:

The Federal Communications Commission ("FCC") requires certain incumbent local exchange carriers to report rate floor data by July 1 of each year.¹ The rate floor established by the FCC for the period beginning July 1, 2014 (rates in effect as of June 1, 2014) is \$20.46.² On June 30, 2014, we provided to the Public Service Commission of South Carolina ("Commission") a copy of the required annual reports on behalf of the South Carolina Telephone Coalition member companies, as required by 47 C.F.R. §54.313(i).

FCC rules also provide that, in addition to the annual filing, local exchange carriers *may* file updates of their rates for residential local service by January 2 of each year, reflecting rates in effect as of December 1. *See* 47 C.F.R. §54.313(h)(2). While this filing is not mandatory, we are providing copies of updated information for the following companies that increased residential rates effective December 1, 2014, to meet the FCC's national average transition rate of \$16.00: Lockhart Telephone Company d/b/a TruVista; McClellanville

¹ *See* 47 C.F.R. §54.313(h). Incumbent local exchange carriers that receive high-cost federal universal service support *and* that have rates below the FCC's rate floor are required to file annual reports by July 1 each year.

² *See* Report and Order, Declaratory Ruling, Order, Memorandum Opinion and Order, Seventh Order on Reconsideration, and Further Notice of Proposed Rulemaking, *In the Matter of Connect America Fund, Universal Service Reform – Mobility Fund, ETC Annual Reports and Certifications, Establishing Just and Reasonable Rates for Local Exchange Carriers, and Developing an Unified Intercarrier Compensation Regime*, WC Docket No. 10-90, WT Docket No. 10-208, WC Docket No. 14-58, WC Docket No. 07-135, CC Docket No. 01-92, FCC 14-54 (rel. June 10, 2014), at ¶¶ 80 and 84 (The FCC waived the application of section 54.318(b) of its rules for lines with a rate of \$16 or above as of December 1, 2014, but did not waive section 54.313(h) of the rules and, therefore, incumbent ETCs must report rates to the extent they fall below the announced urban rate floor of \$20.46).
COLUMBIA 1191748v1

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Columbia, SC 29201

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Columbia, SC 29211

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MCNAIR
ATTORNEYS

Telephone Company (TDS); Norway Telephone Company (TDS); and Palmetto Rural Telephone Cooperative, Inc.

The line count information reported by the companies is competitively sensitive information. Accordingly, a motion for confidential treatment accompanies this filing, and we are providing both public redacted and confidential versions of the filing.

If you should need further information, please do not hesitate to contact me.

Very truly yours,

MCNAIR LAW FIRM, P.A.



Margaret M. Fox

Enclosure

cc: Nanette S. Edwards, Esquire, ORS
Tom Harper, TruVista
Jim Meade, TDS
Valerie Ancrum, Palmetto Rural Telephone Cooperative, Inc.

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
Docket No. 2013-268-C

Re: Rate Floor Certifications Filed Pursuant to Federal)
Communications Commission Regulation 47 C.F.R.)
§54.313(h))
_____)

MOTION REQUESTING THAT MATERIALS BE TREATED AS CONFIDENTIAL

Lockhart Telephone Company, McClellanville Telephone Company, Norway Telephone Company, and Palmetto Rural Telephone Cooperative, Inc. (the “Companies”) respectfully request that the South Carolina Public Service Commission (“Commission”) treat the materials accompanying this motion as confidential. This motion is made on the following grounds:

1. Incumbent local exchange carrier Eligible Telecommunications Carriers (“ETCs”) who receive federal high cost support are required to report all of their rates for residential local service for all portions of their service area, as well as state fees as defined in rules promulgated by the Federal Communications Commission (“FCC”), to the extent the sum of those rates and fees are below the urban rate floor established by the FCC, and the number of lines for each rate specified. The rate floor that was established by the FCC for purposes of the July 1, 2014 annual filing is \$20.46. The Companies filed annual reports with the FCC, the Universal Service Administrative Company (“USAC”), and the Commission, on or before July 1, 2014, as required. *See* 47 C.F.R. § 54.313(i).

2. FCC rules also provide that, in addition to the annual filing, local exchange carriers *may* file updates of their rates for residential local service by January 2 of each year, reflecting rates in effect as of December 1. *See* 47 C.F.R. §54.313(h)(2). While this filing is not mandatory, the Companies have made such a filing with the FCC and USAC to reflect updates to the Companies' rates effective December 1, 2014, to meet the FCC's national average transition rate of \$16.00. The Companies are providing a copy of this updated information to the Commission, as contemplated by FCC rules.

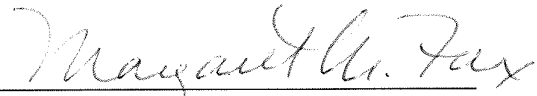
3. The rate floor data report contains line count information for various rates. This information is confidential, proprietary, competitively-sensitive business information which, if disclosed, would cause competitive harm to the companies. Protection of such confidential and proprietary information is consistent with Commission precedent. The Commission has previously granted confidential treatment to rate floor certification data report information. *See* Order No. 2014-606 in the above-captioned docket.

4. We ask that the materials described above be afforded confidential treatment by the Commission. In accordance with the Commission's guidelines, as set forth in Commission Order No. 2005-226, "Order Requiring Designation of Confidential Materials," the accompanying confidential materials are being filed in a separate envelope, which is clearly marked "Confidential." Each confidential page of the materials is clearly marked "Confidential." We are also providing a public redacted version of the filing.

WHEREFORE, Lockhart Telephone Company, McClellanville Telephone Company, Norway Telephone Company, and Palmetto Rural Telephone Cooperative, Inc. respectfully request that the Commission treat the accompanying materials as confidential, for the reasons stated herein.

Respectfully submitted,

McNair Law Firm, P.A.
Post Office Box 11390
Columbia, South Carolina 29211
(803) 799-9800

By: 
M. John Bowen, Jr.
Margaret M. Fox

ATTORNEYS FOR LOCKHART TELEPHONE
COMPANY, McCLELLANVILLE TELEPHONE
COMPANY, NORWAY TELEPHONE
COMPANY, AND PALMETTO RURAL
TELEPHONE COOPERATIVE, INC.

Columbia, South Carolina
December 30, 2014

Lockhart Telephone Company, d/b/a TruVista

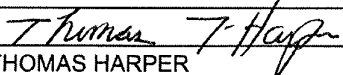
Rate Floor Certification and Data

Pursuant to 47 C.F.R. §§ 54.313(h)

Rate Floor Template

Certification of Officer as to the Accuracy of the Data Reported for the Rate Floor Data

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the actual rate floor data reported ; and, to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier				LOCKHART TELEPHONE COMPANY	
Signature of authorized officer					Date
Printed name of authorized officer			THOMAS HARPER		12/10/14
Title or position of authorized officer			VICE PRESIDENT - ADMINISTRATION & REGULATORY AFFAIRS		
Telephone number of authorized officer:			(803) 581-9164 ext.		
Study Area Code of Reporting Carrier		240532	Filing Due Date for this form (mm/dd/yyyy)	01/02/2015	

REDACTED
RATE FLOOR DATA

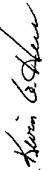
McClellanville Telephone Company (TDS)

Rate Floor Certification and Data

Pursuant to 47 C.F.R. §§ 54.313(h)

Certification of Officer as to the Accuracy of the Data Reported for the Rate Floor Data

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the actual rate floor data reported; and, to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier		See list below.	
Signature of authorized officer or employee		<div style="text-align: center;">  _____ </div>	
Printed name of authorized officer or employee		Kevin G. Hess	
Title or position of authorized officer or employee		Sr. Vice President	
Telephone number of authorized officer or employee: (608) 664 - 4160, ext. _____			
Study Area Code of Reporting Carrier	See list below.	Filing Due Date for this form (mm/dd/yyyy)	1/2/2015

Study Area Name MCCLELLANVILLE TELEPHONE COMPANY NORWAY TELEPHONE COMPANY	Study Area Code 240533 240535	Title of Certifying Officer or Employee Company Officer Company Officer
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REDACTED
RATE FLOOR DATA

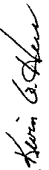
Norway Telephone Company (TDS)

Rate Floor Certification and Data

Pursuant to 47 C.F.R. §§ 54.313(h)

Certification of Officer as to the Accuracy of the Data Reported for the Rate Floor Data

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the actual rate floor data reported; and, to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier	See list below.		
Signature of authorized officer or employee			Date 12/9/2014
Printed name of authorized officer or employee	Kevin G. Hess		
Title or position of authorized officer or employee	Sr. Vice President		
Telephone number of authorized officer or employee:	(608) 664 - 4160, ext.		
Study Area Code of Reporting Carrier	See list below.	Filing Due Date for this form (mm/dd/yyyy)	1/2/2015

Study Area Name	Study Area Code	Title of Certifying Officer or Employee
MCCLELLANVILLE TELEPHONE COMPANY	240533	Company Officer
NORWAY TELEPHONE COMPANY	240535	Company Officer

REDACTED
RATE FLOOR DATA

Palmetto Rural Telephone Cooperative, Inc.

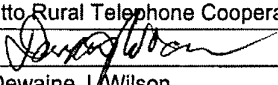
Rate Floor Certification and Data

Pursuant to 47 C.F.R. §§ 54.313(h)

Rate Floor Template

Certification of Officer as to the Accuracy of the Data Reported for the Rate Floor Data

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the actual rate floor data reported ; and, to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier Palmetto Rural Telephone Cooperative, Inc.			
Signature of authorized officer 			Date 12/11/2014
Printed name of authorized officer Dewaine J. Wilson			
Title or position of authorized officer Chief Financial Officer			
Telephone number of authorized officer: (843) 538-9090 ext. 1010			
Study Area Code of Reporting Carrier	240536	Filing Due Date for this form (mm/dd/yyyy)	01/02/2015

REDACTED
RATE FLOOR DATA